

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
(St. Louis)**

In Re:)	
)	
Jason Fauss)	
)	
)	
Debtor,)	Case No. 20-41032
<hr style="width:60%; margin-left:0"/>)	
)	Chapter 13
)	
U.S. Bank Trust National Association, as Trustee of the Tiki)	
Series III Trust)	
)	
Creditor.)	

**SECURED CREDITOR’S OBJECTION TO
CONFIRMATION OF SECOND AMENDED CHAPTER 13 PLAN**

COMES NOW SN Servicing Corporation the servicing agent for U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust, its subsidiaries, affiliates, predecessors in interest, successors, and assigns (the “Secured Creditor”), by and through its attorney David Noyce, and for its objection to the second amended plan states as follows:

1. The Secured Creditor is the holder of a promissory note executed by Debtor Jason Fauss and Kara Fauss in the original principal amount of \$414,200.00 secured by a lien on real property owned by the Debtor located at 1412 Heritage Valley Drive, High Ridge, Missouri 63049.

2. The Debtor’s Second Plan filed on March 24, 2021, indicates under Section 5.1 that the Trustee is to make no Pre-Petition arrears payments to the Secured Creditor as the Debtor will seek a loan modification with the Secured Creditor.

3. The Secured Creditor advises the Court that the parties previously attempted a trial payment plan in furtherance of completing a loan modification but the same was not

successfully completed and, at this time, the Secured Creditor has advised Debtor that he does not qualify for a loan modification.

WHEREFORE, for the foregoing reasons, Secured Creditor respectfully requests that this Court enter an Order denying said Second Amended Plan and for other such relief as the Court deems proper.

Respectfully Submitted,

MARINOSCI LAW GROUP, P.C.

/s/ David V. Noyce
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ATTORNEY FOR CREDITOR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Objection was filed electronically on April 9, 2021 with the United States Bankruptcy Court, and has been served on the following parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice:

Jason Fauss
11965 Saint Charles Rock Rd
Ste 202
Bridgeton, MO 63044-2628

Diana S. Daugherty
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

/s/ David V. Noyce
David V. Noyce